

Complaint Exhibit No. 2.

**U.S. Patent No. US7,650,376 v. AMC Networks
Exemplary Claim of Infringement, Claim 37**

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1. Claim Chart

Claim		Analysis
<p>[37.P] A computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network, comprising:</p>	A or	<p>AMC Networks (“Company”) makes, uses, sells, and/or offers to sell a computer-readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network,</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides the AMC+ application, a streaming platform (“computer-readable storage medium or media encoded with one or more computer programs”), that allows users to watch originals, series, movies, and live TV. Further, AMC+ operates as a virtual multichannel video programming distributor (v-MVPD) that provides on-demand video content over the internet (“effecting the provision of content over a network”).</p>

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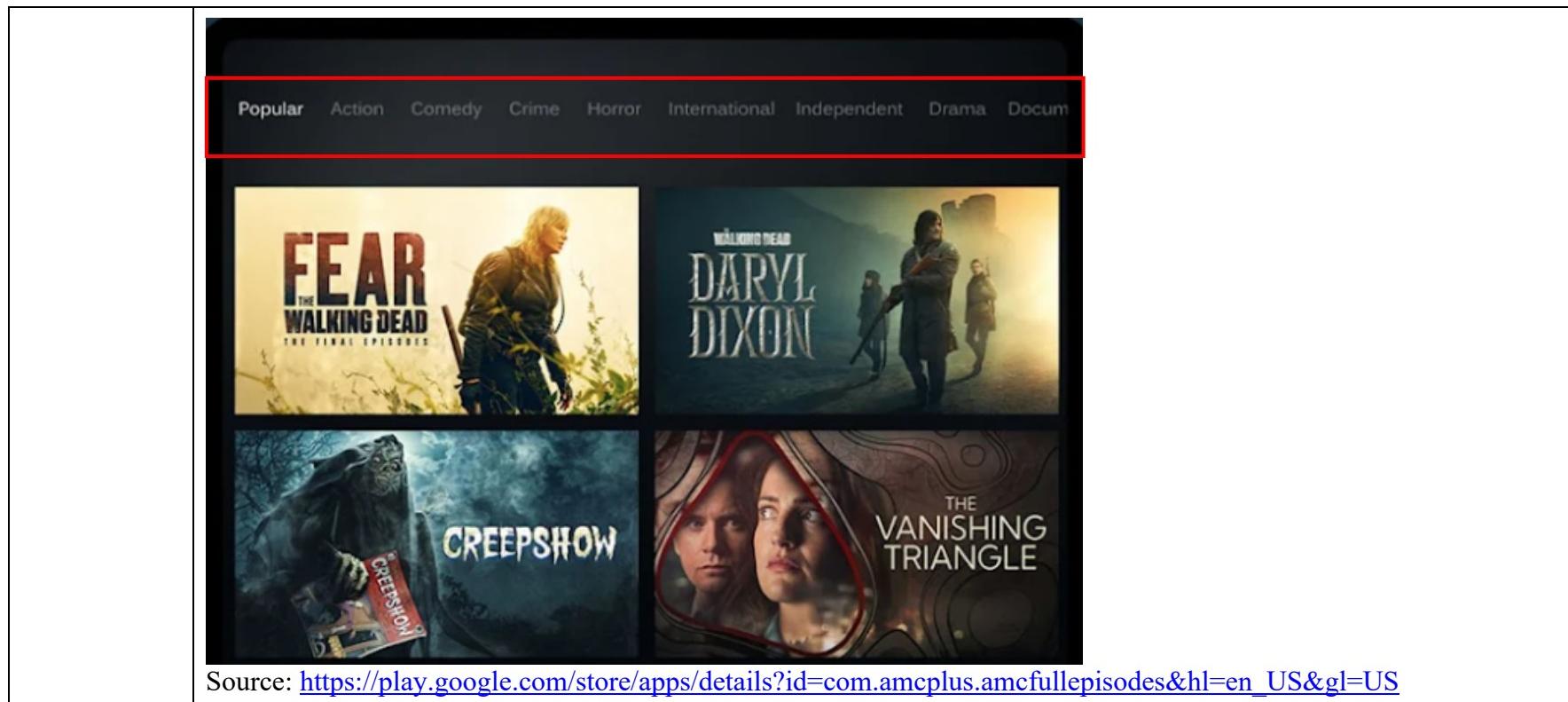
The screenshot shows a dark-themed website for AMC+. At the top left, there's a teal-colored bar with the text "CONTACT US" and the "AMC+" logo. Below this, a large white section title "WHAT IS AMC+?" is displayed in bold, uppercase letters. The main content area is a large black box containing text about the service. A red rectangular border highlights the first paragraph of text. The source URL is provided at the bottom of the black box.

WHAT IS AMC+?

AMC+ is a premium streaming bundle featuring world-class originals, award-winning series and exclusive movies made just for you. Experience the ultimate fan destination of The Walking Dead Universe, escape into the immersive world of Anne Rice, and discover your next obsession with a collection of iconic brands including the spine-tingling horror of Shudder, captivating dramas & mysteries from Sundance Now, and culture-defining movies from IFC Films. AMC+ is entertainment uncompromised...more of what you want, less of everything else.

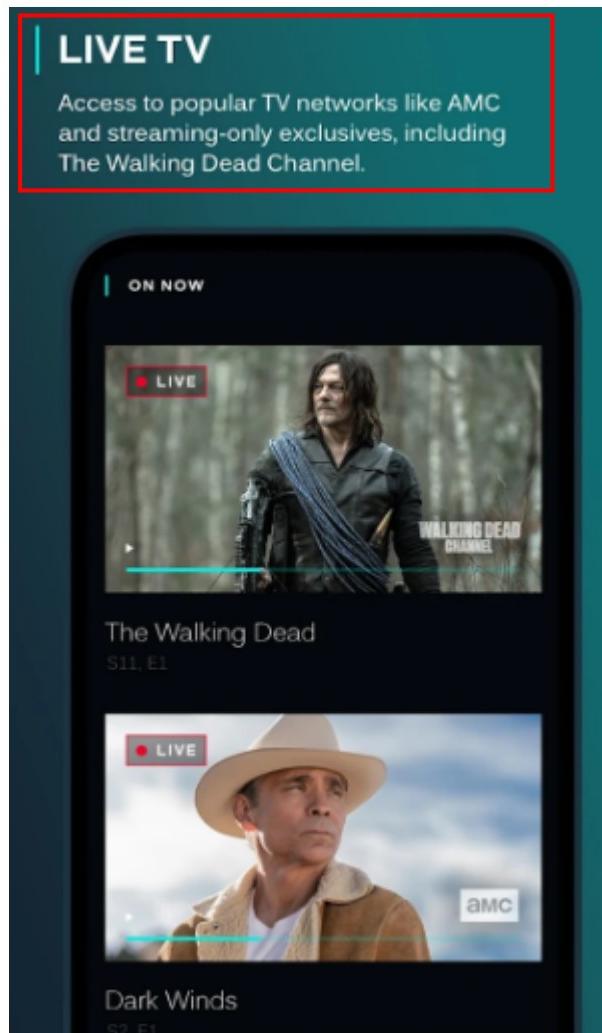
Source: <https://www.amcplus.com/faqs>

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Source: https://play.google.com/store/apps/details?id=com.amcplus.amcfullepisodes&hl=en_US&gl=US

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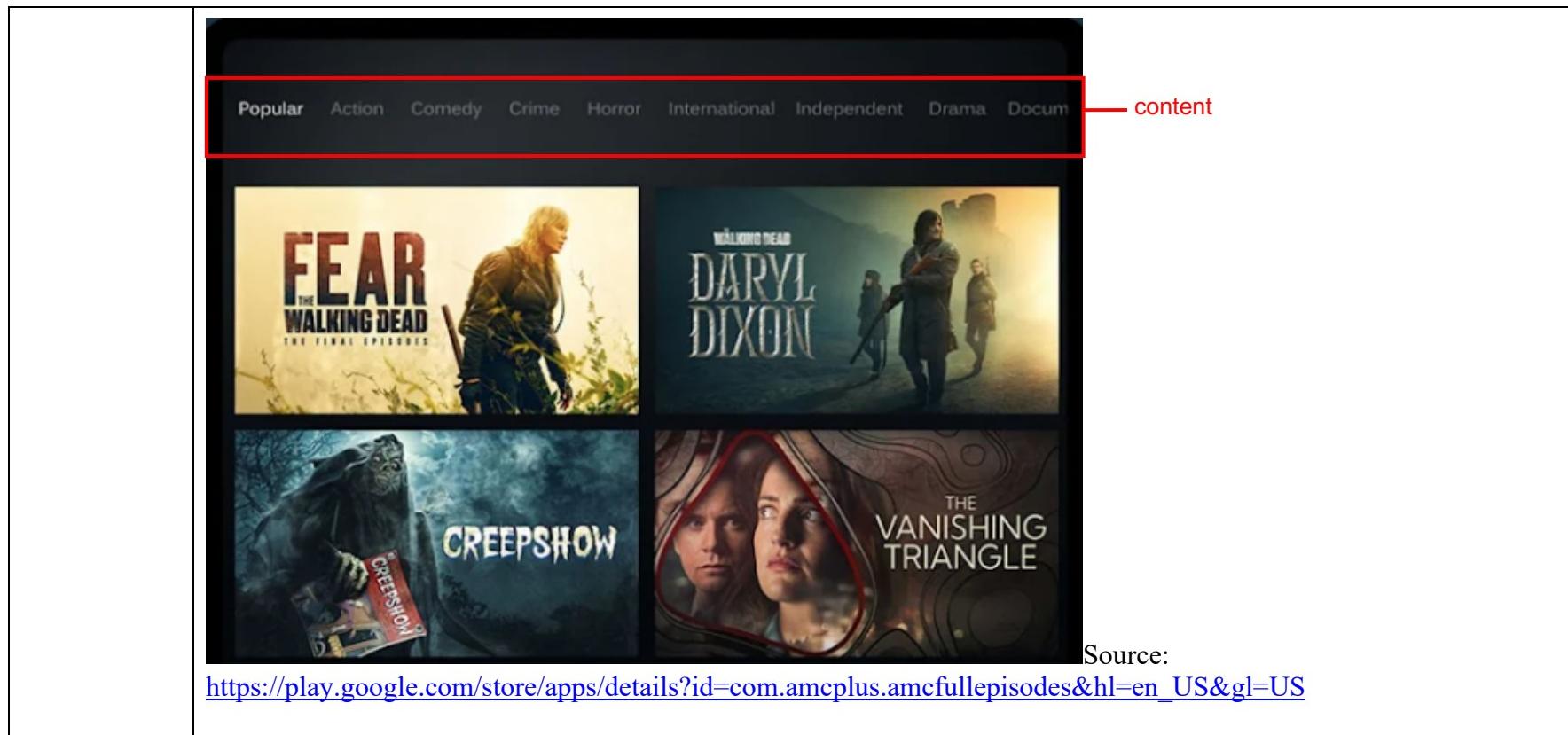


Source: https://play.google.com/store/apps/details?id=com.amcplus.amcfullepisodes&hl=en_US&gl=US

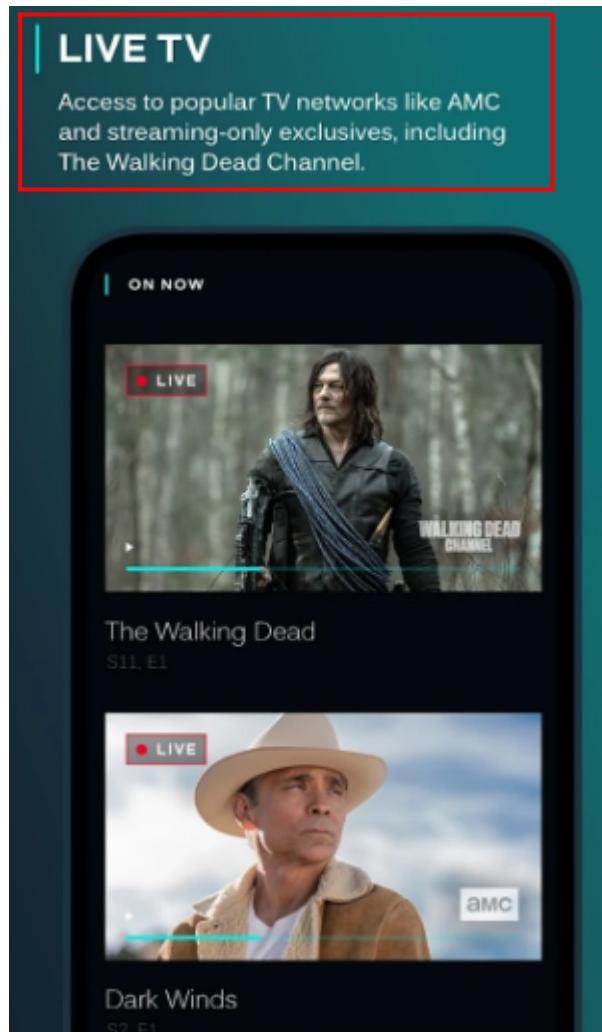
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	<ul style="list-style-type: none"> AMC+ is available to subscribers through either ad-supported or commercial free plans through our DTC apps, as well as through MVPDs and virtual MVPDs, and digital streaming platforms such as Amazon Prime Video Channels, Apple TV Channels and The Roku Channel. <p>Source: https://investors.amcnetworks.com/node/14471/html</p> <p>A Virtual Multichannel Video Programming Distributor (V-MVPD) can offer a broad range of premium video content as any other Cable MSO or a video service provider over the Internet, but without having to own any network infrastructure. Today, OTT players like</p> <p>Source: https://www.infosys.com/industries/communication-services/white-papers/documents/virtual-multichannel-video-programming.pdf, Page 2</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
[37.1] instructions for receiving a request from a client for specified content;	<p>Company provides instructions for receiving a request from a client for specified content.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the AMC+ application provides multiple content options for the user ("a client") such that the user selects and watches the desired content ("instructions for receiving a request from a client for specified content").</p>

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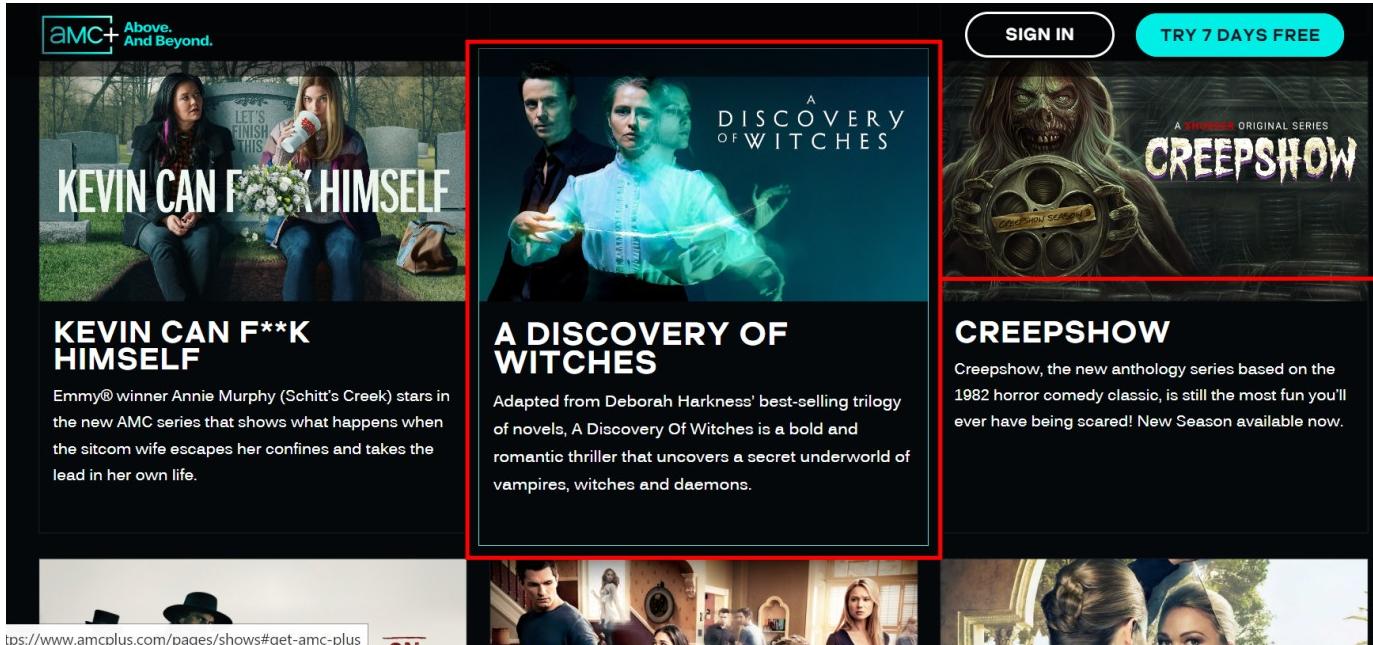


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Source: https://play.google.com/store/apps/details?id=com.amcplus.amcfullepisodes&hl=en_US&gl=US

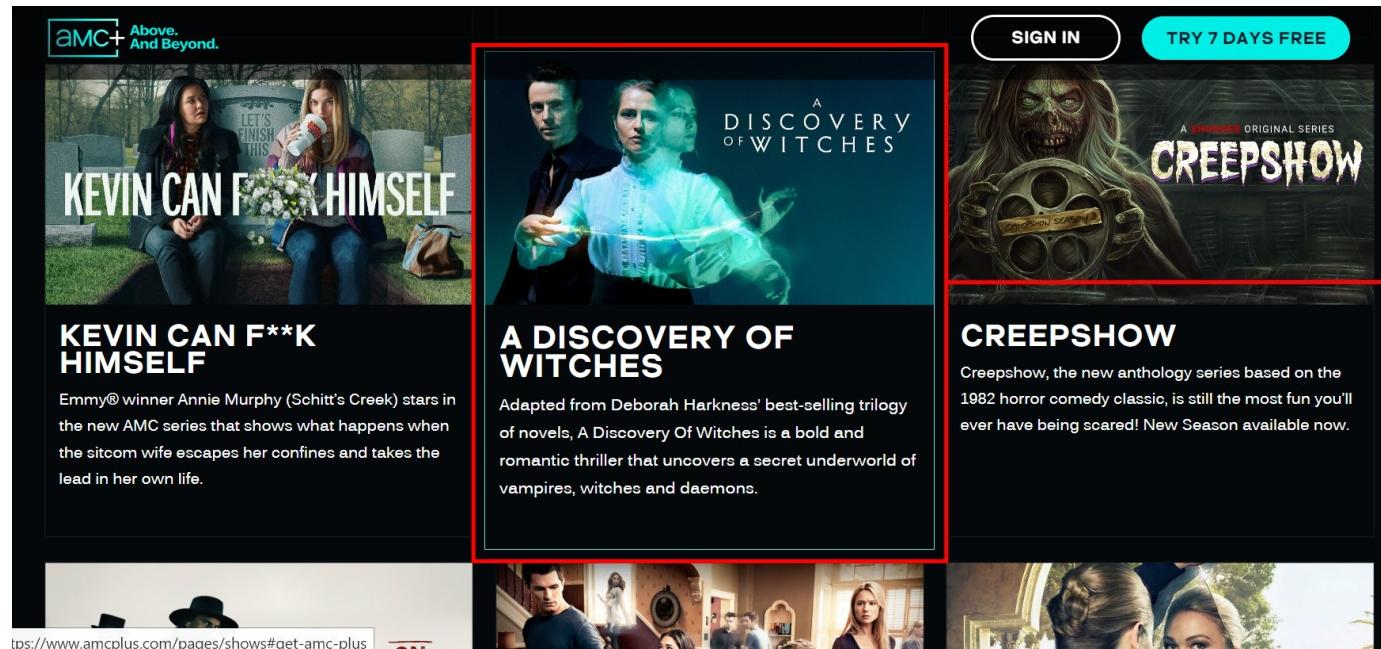
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	 <p>KEVIN CAN F**K HIMSELF Emmy® winner Annie Murphy (Schitt's Creek) stars in the new AMC series that shows what happens when the sitcom wife escapes her confines and takes the lead in her own life.</p> <p>A DISCOVERY OF WITCHES Adapted from Deborah Harkness' best-selling trilogy of novels, A Discovery Of Witches is a bold and romantic thriller that uncovers a secret underworld of vampires, witches and daemons.</p> <p>CREEPSHOW Creepshow, the new anthology series based on the 1982 horror comedy classic, is still the most fun you'll ever have being scared! New Season available now.</p> <p>Source: https://www.amcplus.com/pages/shows#get-amc-plus (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>	Request from a client for specified content
[37.2] instructions for communicati ng to the client the identity of a node server having the specified	<p>Company provides instructions for communicating to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the user requests the desired content by selecting it, the AMC+ application processes the request to search within its network for the content/service providers ("a node server having the specified content stored thereon") such that the user accesses the content from the identified content/service providers. Since the requested content is presented to the user through the AMC+ application over the internet, upon information and belief, the application</p>	

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content stored thereon, thereby enabling the client to request transmission of the specified content from the node server; and

comprises instructions for communicating to the users the identity of the content providers, thereby enabling the user to request transmission of the specified content from the content providers.



Source: <https://www.amcplus.com/pages/shows#get-amc-plus> (annotated)

- Service providers. We engage service providers to assist us in providing the Services and conducting other business operations. For example, we may use service providers to store our digital Content, deliver marketing communications, personalize and optimize the Services, analyze data about users' interactions with our services, administer and process surveys or other research, process transactions, or to collect debts.

Source: <https://www.amcnetworks.com/privacy-policy/>

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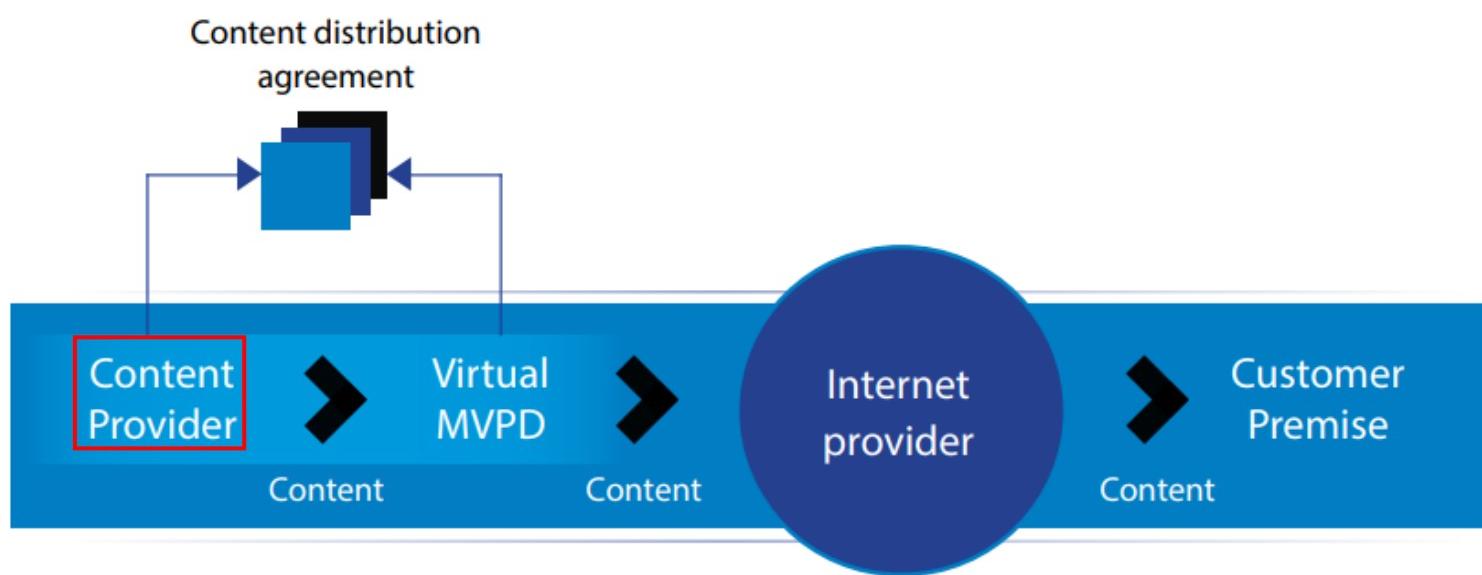


Figure 1: V-MVPD

Source: <https://www.infosys.com/industries/communication-services/white-papers/documents/virtual-multichannel-video-programming.pdf>, Page 3

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	<p>How does a Virtual-MVPD work?</p> <p>A Virtual MVPD operates in the same way as an MSO by acting as a content service provider, without any constraints of directly owning the network infrastructure for content delivery. They</p> <ol style="list-style-type: none">1. Sign up content distribution agreement with multiple providers.2. Host the content for streaming via 3rd party internet. <ol style="list-style-type: none">3. Provide a streaming device at the customer premise to receive the content securely. Some of them pre-integrate this with TV manufacturers.4. Stream the content through customer's choice of broadband provider.5. Bill the customer on a subscription/transaction basis for the content <p>Source: https://www.infosys.com/industries/communication-services/white-papers/documents/virtual-multichannel-video-programming.pdf, Page 3</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
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<p>[37.3] instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission of the specified content to the client.</p>	<p>Company provides instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for the transmission of the specified content to the client.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, when the user selects the content, the application identifies the content/service provider and securely delivers the requested content to the user. Therefore, it would be apparent to a person having ordinary skill in the art that the application includes instructions for ascertaining that the content providers transmitted the specified content to the user.</p> <p>Further, the application provides multiple subscription plans for the user to access the content provided in the application such that the user is billed for accessing the content. Therefore, it would be apparent to a person having ordinary skill in the art that the AMC+ application (“an owner of the node server”) receives an incentive as compensation for transmitting the specified content to the client.</p>
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How does a Virtual-MVPD work?

A Virtual MVPD operates in the same way as an MSO by acting as a content service provider, without any constraints of directly owning the network infrastructure for content delivery. They

1. Sign up content distribution agreement with multiple providers.
2. Host the content for streaming via 3rd party internet.
3. Provide a streaming device at the customer premise to receive the content securely. Some of them pre-integrate this with TV manufacturers.
4. Stream the content through customer's choice of broadband provider.
5. Bill the customer on a subscription/transaction basis for the content

Source: <https://www.infosys.com/industries/communication-services/white-papers/documents/virtual-multichannel-video-programming.pdf>, Page 3

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How much does AMC+ cost?



Modified on: Thu, 28 Sep, 2023 at 2:05 PM

Subscribing From Our Website or Apps

Ad-free Monthly Plans

The standard monthly cost of AMC+ is \$8.99 (plus tax). The standard price for the annual plan is \$83.88 (plus tax), which averages to \$6.99 monthly.

Subscribe at www.amcplus.com or within the AMC+ app

Subscription
plans

Monthly With Ads Plan

The standard monthly cost for a monthly AMC+ plan with ads is \$4.99 (plus tax).
(There is not currently an annual with ads option.)

Subscribe at www.amcplus.com or within the AMC+ app (not currently available via Roku and Comcast Xfinity)

Source: <https://support.amcplus.com/en/support/solutions/articles/11000094816-how-much-does-amc-cost-> (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

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2. List of References

1. <https://www.amcplus.com/faqs>, last accessed on May 17, 2024.
2. https://play.google.com/store/apps/details?id=com.amcplus.amcfullepisodes&hl=en_US&gl=US, last accessed on May 17, 2024.
3. <https://investors.amcnetworks.com/node/14471/html>, last accessed on May 17, 2024.
4. <https://www.infosys.com/industries/communication-services/white-papers/documents/virtual-multichannel-video-programming.pdf>, last accessed on May 17, 2024.
5. <https://www.amcplus.com/pages/shows#get-amc-plus>, last accessed on May 17, 2024.
6. <https://www.amcnetworks.com/privacy-policy/>, last accessed on May 17, 2024.
7. <https://support.amcplus.com/en/support/solutions/articles/11000094816-how-much-does-amc-cost->, last accessed on May 17, 2024.